



Expanded Robocall Mitigation Program Filing

Robocall Mitigation Compliance with TRACED Act

February 26, 2024

Edify Labs, Inc. ("Edify")

1. Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify to the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant.

Edify submits its Amended Robocall Mitigation Plan pursuant to the Federal Communications Commission's (FCC's) Public Notice of January 25, 2024 (DA 24-73) and its Sixth Report and Order (FCC 23-18).

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- (a) details the reasonable steps taken to avoid originating illegal robocalls;
- (b) demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls; and
- (c) is filed in the Robocall Mitigation Database.

Edify certifies to the best of its knowledge and belief that it is compliant with the FCC's rules governing robocall mitigation. Edify implemented the STIR/SHAKEN authentication framework on its network effective June 30, 2021, via its carrier partner. Calls that Edify originates on that network are compliant with 47 C.F.R. § 64.6301(a), and any non-IP calls are subject to a robocall mitigation program consistent with 47 C.F.R. § 64.6305. Edify further certifies that a prior certification has not been removed by FCC action nor has Edify been prohibited from filing in the Robocall Mitigation Database.

2. Company Background

Edify is a carrier/voice service provider of VoIP services and complies with all applicable rules and regulations regarding the implementation of the STIR/SHAKEN framework for voice service providers. Edify works via commercial arrangements it has with one or more US partner carriers to authenticate all IP-based calls that Edify originates and passes into the US public switched network and to ensure these calls are authenticated and attested in accordance with the Commission's rules. Edify will continue to comply with all applicable rules and regulations regarding the implementation of the STIR/SHAKEN framework for providers.



Edify has implemented the following Robocall Mitigation Program to detect and prevent unlawful robocalls from originating on its network effective as of June 30, 2021. All calls that originate on Edify's network are subject to the described robocall mitigation program.

Edify may modify, add, delete or otherwise alter any of the policies and procedures described in this plan at any time it deems appropriate for its business and to further the goals underlying the Commission's rules.

3. General Prohibition Against Illegal Robocalling

Edify customers and end user services are subject to restrictions contained in its published legal notices and all executed orders and master service agreements (i.e. contracts) include the requirement that service is provided pursuant to its terms of service ("TOS") and acceptable use policy ("AUP") requirements.

Edify's existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

- the use of software that automatically dials telephone numbers pulled from a list and connects either to a live agent or a prerecorded message ("Auto Dialer");
- engaging in short duration calls (i.e. a call equal to or less than six (6) seconds in duration);
- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call (i.e re-classifying or re-originating traffic);
- taking any other action to make traffic appear as if it: (i) is anything other than the type of traffic delivered (including but not limited to making time division-multiplexing packet (TDM) originated traffic appear to be internet protocol (IP) originated) or (ii) originated from a place or on a type of equipment different from the place or type of equipment from where it, in fact, originated;
- modifying, altering or deleting in any manner calling party number information, originating point codes or any other signaling information, or call detail in connection with the transport and termination of traffic to the called party; and
- violating any applicable local, state, or federal law; using the Edify service to engage in or in connection with fraudulent activities.

Edify's existing AUP expressly references the prohibition on robocalling. Prohibited activities under the AUP specifically includes:

- Robocalls. Sending unsolicited calls, messaging, emails, continuous or extensive call forwarding, continuous connectivity, fax broadcast/blasting, telemarketing, predictive dialing, auto-dialing or predictive-dialing (sometimes referred to as "robo-calling"). Short duration calls (i.e. a call equal to or less than six (6) seconds in duration) or long duration calls (defined as calls to the same number in excess of four continuous or cumulative hours within a 24 hour period) and/or calls placed to specific numbers / destinations for the purpose of generating charges or fees for or with a third party.

Edify customers and end users are notified that Edify will take action up to suspension or termination of service for violation of the TOS and/or AUP.



4. Customer Vetting

Edify does not provide free services or trials to consumers. All subscribers on the Edify platform have been vetted and contracted for services; we do not support customers with a predictive dialing use case. Edify collects and verifies information for each customer, such as physical business location, contact person(s), state of incorporation, federal tax ID, and the nature of the customer's business.

Edify maintains a close relationship with its customers through a "Know Your Customer" approach, evaluating its customers' identity and communication intent throughout the customer lifecycle. Edify reviews the businesses' calling patterns, business models, and accredited business standings to establish the customer's existence firmly. This approach helps prevent robocallers from easily spoofing corporate identities. Edify strives to comply with the Know Your Upstream Provider practices that our gateway and intermediate providers require.

Furthermore, Edify's in-house analytics monitor, alert, and apprehend suspected robocalling activities. If it is determined that an Edify customer is originating prohibited unlawful robocalls on our network, Edify will first warn the customer to stop and then terminate their service if they do not comply.

5. Network Monitoring

Edify's customer software is developed in-house and allows for real-time traffic monitoring, which flags call patterns indicative of potential illegal robocalling. Edify's dynamic traffic analysis can identify behaviors that indicate illicit activity calls, such as intermittent bursts of high activity, suspiciously low call completion rates/short call times, and evidence of systematic calling, or "war dialing." Abnormally high-volume call patterns from a customer would be flagged and addressed.

Additionally, Edify relies on our upstream carrier partners to work with us and notify us of any illegal and inappropriate activity that may be occurring. If unlawful calling is detected, Edify works with our carrier partners and customers in real-time to address and remediate the behavior in a timely manner.

6. Traceback and Enforcement Cooperation

Traceback investigations into the origins of illegal calls are a major component of STIR/SHAKEN enforcement and robocall mitigation. Edify is committed to cooperating with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls that we learn are using our network to complete calls. Edify's team of support experts are dedicated to providing prompt and complete responses to traceback requests.

To date, Edify has received no traceback nor other law enforcement requests that would indicate that Edify's customers are generating illegal calls. Edify will remain vigilant to maintain the trustworthy status of its traffic. Edify will comply with applicable laws in complying with lawful requests for assistance in addressing illegal calls.